

**IN THE UNITED STATES DISTRICT BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re:

GWG Holdings, In., et al¹

Chapter 11

Case No. 22-90032 (MI)

Jointly Administered

**MURRAY HOLLAND’S EMERGENCY MOTION FOR BRIEF
CONTINUANCE OF HEARING SCHEDULED FOR NOVEMBER 17,
2022 AT 1:30 PM (CENTRAL TIME)**

Murray Holland, Director and former President and Chief Executive Officer of GWG Holdings, Inc. (“**GWGH**”), by and through the undersigned counsel, submits this emergency motion (the “**Motion**”) for a brief continuance of the hearing scheduled for November 17, 2022, at 1:30 p.m. (the “**Hearing**”), and respectfully represents as follows in support of the Motion:

PRELIMINARY STATEMENT

1. Mr. Holland is currently unrepresented in his personal capacity with respect to these chapter 11 cases. Although he is in the process of doing so, he has not yet obtained counsel for these proceedings due to the fact that he resigned as CEO of GWGH on the day prior to the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538); GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (none); and GWG DLP Funding Holdings VI, LLC (none). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these Chapter 11 Cases is available at the website of the Debtors’ claims and noticing agent: <https://donlinrecano.com/gwg>.

Emergency Status Conference held on November 14, 2022 that was followed by the Court's Order Temporarily Suspending the Authority of the Board of Directors of GWG Holdings, Inc. (the "**Order**"). Dkt. No. 1061. Mr. Holland is now in the process of obtaining counsel to represent him at the Hearing, but requires additional time to obtain such counsel and prepare for the Hearing in a fulsome and appropriate manner.

2. Mr. Holland has no issue with the Order remaining in place until the matter is adjudicated. Among other things, throughout the adjournment period, Mr. Holland would abstain from voting on any matter that comes before GWGH's Board of Directors.

3. Counsel for the Debtors and the Investigations Committee have been notified that Mr. Holland intends to seek this brief continuance of the Hearing. Counsel for the Debtors have confirmed that the Debtors do not object to a brief continuance of the Hearing if the Order remains in place until the matter is adjudicated.

PRAYER FOR RELIEF

Accordingly, Mr. Holland respectfully requests that the Court grant this Motion and continue the Hearing for all purposes until November 21, 2022, or any date thereafter as the Court's calendar permits.

Date: November 16, 2022

Respectfully submitted,

/s/ Caroline A. Reckler

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**CERTIFICATE OF
SERVICE**

I, Caroline A. Reckler, hereby certify that on November 16, 2022, I caused the foregoing document to be electronically filed with the United States Bankruptcy Court for the Southern District of Texas using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice.

/s/ Caroline A. Reckler

Caroline A. Reckler